

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
<i>Plaintiff,</i>)	
)	No. 1:17-mc-00151-LPS
v.)	
)	
BOLIVARIAN REPUBLIC OF VENEZUELA,)	
)	
<i>Defendant.</i>)	

**DECLARATION OF NATHAN P. EIMER IN SUPPORT OF THE
BOLIVARIAN REPUBLIC OF VENEZUELA, PETRÓLEOS DE VENEZUELA, S.A.,
PDV HOLDING, INC., AND CITGO PETROLEUM CORPORATION'S
MEMORANDUM OF LAW IN SUPPORT OF NOTICE OF OBJECTIONS TO
SPECIAL MASTER'S FINAL RECOMMENDATION**

I, Nathan P. Eimer, declare as follows:

1. I am a partner at the law firm of Eimer Stahl LLP, and I am counsel for PDV Holding, Inc. and CITGO Petroleum Corporation in the above-captioned action.

2. I make this declaration in connection with the Bolivarian Republic of Venezuela, Petróleos de Venezuela, S.A., PDV Holding, Inc., and CITGO Petroleum Corporation's Memorandum of Law in Support of Notice of Objections to the Special Master's Final Recommendation based upon personal knowledge.

3. Attached as **Exhibit 1** to this declaration is a true and correct copy of the Fifth Supplemental Declaration of Randall J. Weisenberger dated July 7, 2025 and its supporting exhibits.

4. Attached as **Exhibit 2** to this declaration is a true and correct copy of the Expert Report of Jose Alberro, Ph.D. dated July 7, 2025.

5. Attached as **Exhibit 3** to this declaration is a true and correct copy of correspondence from Nathan Eimer to Ray Shrock on May 10, 2022.

6. Attached as **Exhibit 4** to this declaration is a true and correct copy of correspondence from Nathan Eimer and Michael Gottlieb to Robert Pincus on August 4, 2022.

7. Attached as **Exhibit 5** to this declaration is a true and correct copy of correspondence from Michael Gottlieb and Nathan Eimer to Joseph Borson on March 28, 2023.

8. Attached as **Exhibit 6** to this declaration is a true and correct copy of correspondence from Nathan Eimer to Ray Shrock on April 16, 2024.

9. Attached as **Exhibit 7** to this declaration is a true and correct copy of correspondence from Nathan Eimer to Robert Pincus on April 23, 2024.

10. Attached as **Exhibit 8** to this declaration is a true and correct copy of correspondence from Joseph Pizzurro to Robert Pincus on April 23, 2024.

11. Attached as **Exhibit 9** to this declaration is a true and correct copy of correspondence from Michael Gottlieb to Robert Pincus on July 3, 2024.

12. Attached as **Exhibit 10** to this declaration is a true and correct copy of correspondence from Nathan Eimer to Robert Pincus on July 11, 2024.

13. Attached as **Exhibit 11** to this declaration is a true and correct copy of correspondence from Joseph Pizzurro to Robert Pincus on August 7, 2024.

14. Attached as **Exhibit 12** to this declaration is a true and correct copy of correspondence from Joseph Pizzurro to Robert Pincus on August 9, 2024.

15. Attached as **Exhibit 13** to this declaration is a true and correct copy of correspondence from Nathan Eimer to Robert Pincus on August 19, 2024.

16. Attached as **Exhibit 14** to this declaration is a true and correct copy of correspondence from Joseph Pizzurro to Robert Pincus on August 19, 2024.

17. Attached as **Exhibit 15** to this declaration is a true and correct copy of correspondence from Juan Perla to Robert Pincus on August 23, 2024.

18. Attached as **Exhibit 16** to this declaration is a true and correct copy of correspondence from Nathan Eimer to Ray Schrock on August 23, 2024.

19. Attached as **Exhibit 17** to this declaration is a true and correct copy of correspondence from David Lender to Juan Perla on August 28, 2024.

20. Attached as **Exhibit 18** to this declaration is a true and correct copy of correspondence from Juan Perla to Robert Pincus on September 5, 2024.

21. Attached as **Exhibit 19** to this declaration is a true and correct copy of correspondence from David Lender to Juan Perla on September 9, 2024.

22. Attached as **Exhibit 20** to this declaration is a true and correct copy of correspondence from Nathan Eimer to Robert Pincus on September 13, 2024.

23. Attached as **Exhibit 21** to this declaration is a true and correct copy of correspondence from Nathan Eimer to Robert Pincus on September 22, 2024.

24. Attached as **Exhibit 22** to this declaration is a true and correct copy of correspondence from Juan Perla to Robert Pincus on September 22, 2024.

25. Attached as **Exhibit 23** to this declaration is a true and correct copy of correspondence from Nathan Eimer to Robert Pincus on November 2, 2024.

26. Attached as **Exhibit 24** to this declaration is a true and correct copy of a draft presentation prepared by Evercore and Weil, Gotschal & Manges LLP dated September 2023 regarding [REDACTED]

27. Attached as **Exhibit 25** to this declaration is a true and correct copy of an email from [REDACTED] to Ray Schrock sent September 13, 2024.

28. Attached as **Exhibit 26** to this declaration is a true and correct copy of a draft

[REDACTED]
[REDACTED] dated September 13, 2024.

29. Attached as **Exhibit 27** to this declaration is a true and correct copy of an email exchange between [REDACTED] and David Ying on September 15, 2024.

30. Attached as **Exhibit 28** to this declaration is a true and correct copy of an email exchange between [REDACTED] and Ray Strong on December 12, 2024 and January 24 and 25, 2025.

31. Attached as **Exhibit 29** to this declaration is a true and correct copy of an email exchange between Chase Bentley, [REDACTED] between January 23, 2025 and February 3, 2025.

32. Attached as **Exhibit 30** to this declaration is a true and correct copy of an email exchange between Chase Bentley, [REDACTED], Ray Strong, and David Ying and [REDACTED] between January 23, 2025 and February 5, 2025.

33. Attached as **Exhibit 31** to this declaration is a true and correct copy of an email from Chase Bentley to Robert Pincus on March 14, 2025.

34. Attached as **Exhibit 32** to this declaration is a true and correct copy of an email exchange between Chase Bentley and Robert Pincus on March 14, 2025.

35. Attached as **Exhibit 33** to this declaration is a true and correct copy of an email exchange between [REDACTED], Eoghan Keenan, [REDACTED] on March 14 and 15, 2025.

36. Attached as **Exhibit 34** to this declaration is a true and correct copy of an email exchange between Chase Bentley and Ray Strong on March 16, 2025.

37. Attached as **Exhibit 35** to this declaration is a true and correct copy of an email exchange between Chase Bentley and David Ying on March 16, 2025.

38. Attached as **Exhibit 36** to this declaration is a true and correct copy of an email exchange between Chase Bentley and [REDACTED] on March 17, 2025.

39. Attached as **Exhibit 37** to this declaration is a true and correct copy of an email exchange between Chase Bentley and [REDACTED] on March 17, 2025.

40. Attached as **Exhibit 38** to this declaration is a true and correct copy of an email exchange between Robert Pincus and Chase Bentley on March 17, 2025.

41. Attached as **Exhibit 39** to this declaration is a true and correct copy of *In re Alexander Jones*, Case No. 22-33553 (S.D. Tex. Bankr.), Dec. 10, 2024 Hr'g Tr.) at 363:9–11.

42. Attached as **Exhibit 40** to this declaration is a true and correct copy of an email exchange between Chase Bentley and [REDACTED] on March 16 and 17, 2025.

43. Attached as **Exhibit 41** to this declaration is a true and correct copy of an email exchange between Chase Bentley and [REDACTED] on March 19, 2025.

44. Attached as **Exhibit 42** to this declaration is a true and correct copy of an email exchange between Michael Winterholler, Andrew Clarke, and Eoghan Keenan, on March 20, and March 21, 2025.

45. Attached as **Exhibit 43** to this declaration is a true and correct copy of an email exchange between Chase Bentley and Ray Strong on March 21, 2025.

46. Attached as **Exhibit 44** to this declaration is a true and correct copy of an email exchange between Ray Strong and Tanja Koivistoinen on April 15, 2025.

47. Attached as **Exhibit 45** to this declaration is a true and correct copy of an email exchange between Robert Pincus and Eoghan Keenan on May 8, 2025.

48. Attached as **Exhibit 46** to this declaration is a true and correct copy of an email exchange between [REDACTED] and Chase Bentley between May 9 and May 12, 2025.

49. Attached as **Exhibit 47** to this declaration is a true and correct copy of an email from Andrew Clarke to [REDACTED] on May 16, 2025.

50. Attached as **Exhibit 48** to this declaration is a true and correct copy of an email from Andrew Clarke to [REDACTED] on May 16, 2025.

51. Attached as **Exhibit 49** to this declaration is a true and correct copy of an email exchange between Robert Pincus and Chase Bentley on May 22, 2025.

52. Attached as **Exhibit 50** to this declaration is a true and correct copy of an email exchange between Chase Bentley, [REDACTED] on June 23, 2025.

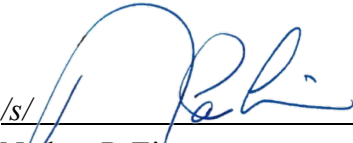
53. Attached as **Exhibit 51** to this declaration is a true and correct copy of an email exchange between David Ying, Ray Strong, William Hiltz, and Robert Pincus on June 24, 2025.

54. Attached as **Exhibit 52** to this declaration is a true and correct copy of a memorandum [REDACTED] dated June 25, 2025.

55. Attached as **Exhibit 53** to this declaration is a true and correct copy of email correspondence from Nathan Eimer to Chase Bentley on June 23, 2025.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct.

Executed this 24th day of July 2025, in Chicago, Illinois.

/s/ 
Nathan P. Eimer